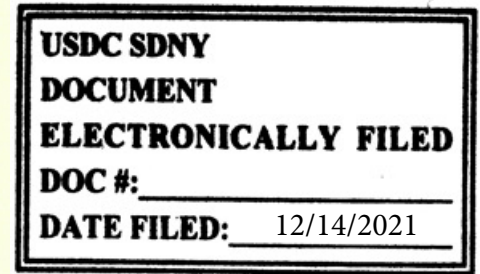


STUART H. FINKELSTEIN

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December 10th, 2021



Magistrate Judge Stewart D. Aaron
Southern District of New York
Daniel Patrick Moynihan
United States District Court
500 Pearl Street - Courtroom 11C
New York, New York 10007

Re: Antolini vs. McCloskey, et al
Case No.: 1:19-cv-09038-GBD

Dear Judge Aaron:

On December 4, 2021 I communicated with defense counsel requesting a meet and confer regarding his responses to Plaintiff's Discovery demands. I advised him of my availability but instead of conducting same, he chose to send me a conditions precedent checklist before he would agree to the meet and confer.

Moreover, Plaintiff submitted his second set of document demands, post deposition of defendant Chung. However, the defendants' lawyer responded today by declaring that discovery is closed.

I ask the Court for a conference as soon as practical.

Very truly yours,

Stuart H. Finkelstein

Plaintiff's Letter Motion (ECF No. 259) is DENIED WITHOUT PREJUDICE. Since discovery has in fact closed, if Plaintiff seeks additional discovery, he shall a formal motion setting forth good cause to reopen discovery. *See* Fed. R. Civ. P. 16(b)(4). In addition, such motion shall set forth the specific discovery sought and make a showing why it is relevant and proportional to the needs of the case. The Court strongly urges the parties "to resolve the dispute without necessitating [further] Court intervention." (*See* ECF No. 260.) SO ORDERED.

Dated: 12/14/2021

A handwritten signature in blue ink, appearing to read "Stewart D. Aaron".

SHF/tc
To all via ECF